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December 13, 2024

**VIA ECF**

Honorable Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1313

Re: **Doolittle v. Bloomberg L.P., et al.**  
**Case No. 22 CV 09136 (JLR)**

Dear Judge Rochon:

This firm represents defendant Bloomberg L.P. (“Bloomberg”). We write to respectfully request leave to file Bloomberg’s pre-motion letter seeking to exclude the testimony of Plaintiff Abigail Doolittle’s expert, Carole Lieberman, M.D., M.P.H., under seal.

Dr. Lieberman is Plaintiff’s forensic psychiatric expert whom Plaintiff retained to perform a psychiatric medical examination of her for purposes of this litigation. Plaintiff designated the expert report prepared by Dr. Lieberman and Dr. Lieberman’s deposition testimony as “highly confidential” under the Protective Order (ECF No. 55) entered in this litigation on November 3, 2023.

Bloomberg’s pre-motion letter seeking to exclude Dr. Lieberman’s expert report and anticipated testimony discusses Dr. Lieberman’s expert report and deposition testimony, both of which Plaintiff designated as highly confidential and both of which concern sensitive medical information about Plaintiff. Counsel for Bloomberg therefore contacted Plaintiff’s counsel regarding the filing of Bloomberg’s pre-motion letter, and Plaintiff’s counsel requested that Bloomberg’s pre-motion letter be filed under seal. At Plaintiff’s request, Bloomberg respectfully requests leave to file its premotion letter under seal today, pursuant to Rule 4.B.iii.c. of Your Honor’s Individual Practice Rules, Standing Order No. 19-MC-00583, *In Re: Electronic Filing Under Seal in Civil Miscellaneous Cases* (S.D.N.Y. Dec. 19, 2019), and Section 6 of the ECF Rules & Instructions for the United States District Court for the Southern District of New York. In accordance with Rule 4.B.iii.c. of Your Honor’s Individual Practice Rules, Bloomberg notified Plaintiff’s counsel that Plaintiff now “must file, within three days, a letter explaining the need to seal or redact” Bloomberg’s pre-motion letter.

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Bloomberg does not oppose Plaintiff's request to seal Bloomberg's premotion letter seeking to exclude the expert report and anticipated testimony of Dr. Leiberman.

Thank you for Your Honor's courtesies in this matter.

Respectfully submitted,

/s/ David W. Garland

David W. Garland

CC: All counsel of record (via ECF)

Per Rule 4.B.iii.b of this Court's Individual Practice Rules, Bloomberg shall file the proposed sealed document under seal on ECF. Within three days of Bloomberg filing its premotion letter under seal, Plaintiff shall file a letter explaining the need to seal or redact the document.

Dated: December 16, 2024  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge